

Biddulph Neighbourhood Development Order

Consultation Statement February 2020



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Introduction

This Consultation Statement summarises the community engagement programme and the Regulation 14 consultation that were undertaken for the Biddulph Neighbourhood Development Order. The document demonstrates how the requirements of Regulations 14 and 15 of the Neighbourhood Planning (General) Regulations 2012 have been satisfied.

Summary of Community Engagement

In 2015, Biddulph Town Council agreed to produce a Neighbourhood Plan for the town of Biddulph. The Town Council set up a Working Group comprising Town Councillors and local residents to take the process forward. Neighbourhood Planning specialists, Urban Vision Enterprise CIC, were appointed to provide professional advice and guidance, and additional consultant support was provided through the Locality scheme.

Following an extensive householder survey in 2017/18, the Neighbourhood Plan Working Group requested approval from Biddulph Town Council to develop a Neighbourhood Development Order. The aspiration was that this would address the issues raised by the community in relation to town centre growth.

The Neighbourhood Plan Working Group endeavoured to ensure that the Neighbourhood Plan and Neighbourhood Development Order (NDO) were viewed as two distinct pieces of work by stakeholders and the community. Whilst the two documents complement each other, separate events and consultations were completed to ensure that the information gathered was focussed and robust for each document.

Through the development of the Neighbourhood Plan a wide range of factual evidence about the town had been collated. Following this, the Working Group sought further views and ideas through a process of community consultation and engagement, focussing on what people valued about the town centre and what they would like to change.

The Working Group agreed to undertake community consultation in three stages:

Stage 1 - Open consultation to find out what people think is good and bad about Biddulph town centre, and should be changed.

Stage 2 - Targeted consultation with stakeholders, residents and interest groups to confirm the main issues identified, and to test the proposed aims and possible policies that would form the basis of the plan.

Stage 3 - Six weeks formal statutory consultation on the draft Neighbourhood Development Order.

Each of these stages is considered below.

Stage 1 – Open Consultation

The purpose of the Stage 1 consultation was to find out what local people think about the town centre, building on the information collated as part of the Neighbourhood Plan Householder Questionnaire. This document was delivered to 8,000 households in the town; additional copies were available at key venues. Responses had to be either posted, hand delivered or completed on Survey Monkey before Christmas 2017. There were 1217 responses, representing households not just individuals.

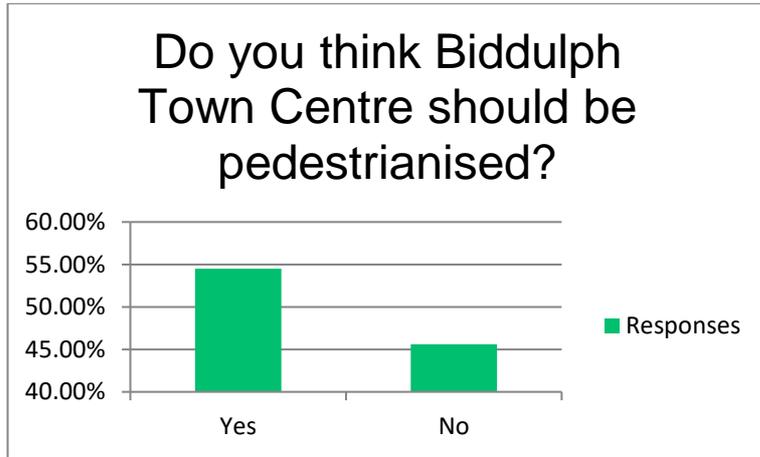
The Questionnaire responses highlighted a number of interesting themes with regards to the town centre, and this phase of the consultation gave an opportunity to ‘test’ these ideas before any plans or proposals were produced. For example:

Q9. Please tell us how important you think the following are:

Answer Choices	Very important	Important	Neutral	Not important	Not important at all	Total
Variety of shops (chains and independents)	834	323	36	6	3	1202
Pubs, restaurants, cafes	384	566	193	43	12	1198
Monthly market in the High Street	262	429	342	98	63	1194
Weekly fresh food stalls in the High Street	299	421	330	102	43	1195
Improving the look of High Street premises	686	378	107	23	4	1198
Mixed business and residential developments	278	450	320	88	41	1177
Promote home working with high speed broadband	379	332	316	84	44	1155
Off-street parking	557	465	119	17	13	1171
Maintain local centres (e.g. shops and pubs outside the main town centre)	450	493	182	41	20	1186
Establishing a Biddulph Museum	165	320	438	176	93	1192
Having an event space outside the Town Hall	187	420	404	121	53	1185

One interesting theme, for example, is that over 1000 respondents felt that it was important or very important to improve the look of High Street premises.

In addition, an issue that has repeatedly been considered within the town is:



Implementation of a pedestrianised zone would necessitate physical changes to the High Street.

The approach to consultation in Stage 1 is widely regarded as good practice, because it enables the community to play an integral role in the development of a document that will highlight their knowledge of, and aspirations for, their town.

The community and local stakeholders had a number of opportunities to consider the role of the town centre and how the spaces within it are used. Below are examples of posters that advertised the 'town tours', coverage in the local press and a questionnaire that was developed to record feedback.

Biddulph Town Council

Join us for a Town Tour!

The Biddulph Neighbourhood Plan Working Group asked households in the town to complete a Householder Questionnaire at the end of 2017. The results from this identified that people living in the town wanted there to be development of the High Street.

- 90% of respondents said it was important to have a variety of shops;
- 85% of replies noted it was important to improve the look of High Street premises;
- 73% of people felt that the road system leading to the town centre should be upgraded.

The Working Group is putting together a Neighbourhood Development Order, in conjunction with the Neighbourhood Plan, which will help to improve the town.

Neighbourhood Development Orders (NDOs) will grant planning permission for a particular type of development in a designated area. As part of this work, the Group are looking at signage, use of pavement space and shared space - particularly outside Biddulph Town Hall.

Please join us to look at the High Street with fresh eyes as we walk around the town centre! The 'Town Tour' will begin to record ideas that could form part of the Neighbourhood Development Order. The Group will meet at the Town Hall on:

Wednesday 15 August at 2.30pm
Saturday 8 September at 10am or
Wednesday 12 September at 1.15pm.

If you would like more information, please contact the Town Council on 01782 297845 or email biddulph@staffordshire.gov.uk, or call in to the Town Hall.

We look forward to seeing you!



Biddulph Town Council

This event forms part of the Neighbourhood Plan and Neighbourhood Development Order community engagement. We aim to record and note important features such as boundary treatments, height of buildings, uses at ground and upper floors, public realm and much more. During the tour we will be considering what works well and where could we improve.

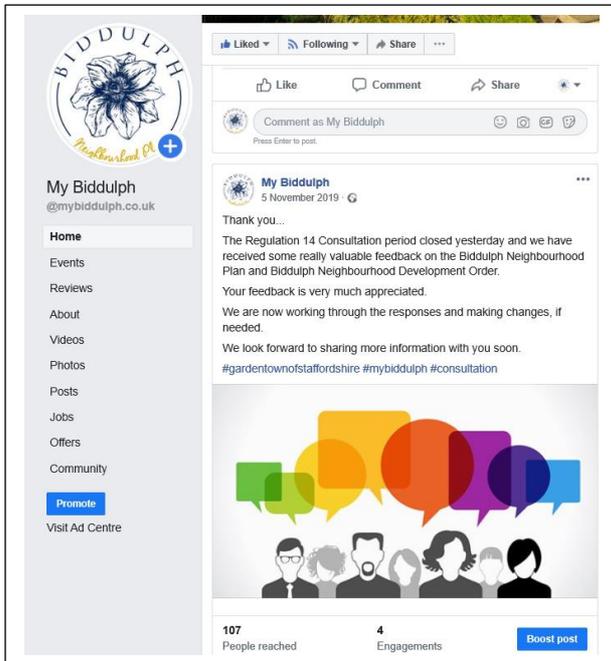
Please record your thoughts and observations in the following table and remember to tell us where these are in the Town and say if they are good or bad.

<p>Boundary Treatments, (walls, landscaping, fencing etc.)</p> <p>Heights of buildings</p> <p>Dominant Buildings (redundant, occupied, mixed use)</p> <p>What works well?</p> <p>What does not work well?</p> <p>Signage, shopfronts</p>	<p>What makes people use the High Street?</p> <p>Is the High Street busy?</p> <p>How does the street function? (Bin storage, collections & deliveries?)</p> <p>Uses, what are the mix of uses/businesses?</p> <p>Materials (what materials do we see the most off, colour, texture)</p> <p>Streetfronts (setting, character, what's special about the High Street?)</p> <p>Any other thoughts or observations?</p>
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Biddulph Town Council
Town Hall, High Street, Biddulph, Staffordshire ST8 6JZ

Biddulph Town C
Town Hall, High Street, Biddulph, Staffordshire ST8 6JZ

Throughout all stages of consultation, the Working Group felt it was essential to engage with the community in a range of different ways. A Facebook page 'My Biddulph', contained relevant updates. Information was also added to the www.biddulph.co.uk website and updates were published in the printed press. Below is an exert that was placed in the Biddulph Times free newspaper, which is delivered to homes across the town.



Biddulph Times, November 2018:

Dates for the diary

*We invite you to help create a **Neighbourhood Development Order**. This will guide the development of the town centre...*

On Friday 7 December, 10-3pm and Saturday 19 January 2019, 10-2pm we are holding consultations in the Town Hall to find out what you think about our proposals in relation to the Neighbourhood Development Order and the proposed Local Green Space Designations. Please add these dates to your diary tell us what you think!

Stage 2 – Targeted Consultation

The purpose of Stage 2 was to consult with stakeholders, residents and interest groups on specific details contained in the draft Neighbourhood Development Order (NDO) to confirm the main issues identified, and to test the proposals. The Neighbourhood Plan Working Group organised two periods of consultation, which coincided with consideration of draft Local Green Space Designations.



FREE TEA AND CAKE AT BIDDULPH TOWN HALL!

Friday 7th December 2018, 10 - 3pm

We want to know two things, while you're with us:

- 1) What do you like and what would you change about the town centre?
- 2) What local green spaces are important to you?

This is a drop-in event. There will be a further event on Saturday 19th January 2019, if you are not able to join us this time.



Help us to get it right- Neighbourhood Plan consultation

Friday 7 December 2018, 10-3pm

Visit the last Artisan Market of the year and join us in the Town Hall for tea and cake! We want to know two things, while you're with us:

- 1) What do you like and what would you change about the town centre?
- 2) The Staffordshire Moorlands District Council Local Plan identified 9 areas that should be given a 'Local Green Space Designation'. This means it's an important community area that should be protected. It can include playgrounds, allotments, green spaces at the end of cul-de-sacs, etc. We think we have identified 60+ sites, but we want to make sure we've got them all. Are there any areas near you that you want to protect? Do you agree with those that we've identified?

This is a drop-in event. There will be a further event on Saturday 19 January 2019, if you are not able to join us this time.

Biddulph Town Council 01782 297845 or biddulph@staffordshire.gov.uk for more information.



Biddulph Neighbourhood Development Order



What is a Neighbourhood Development Order?

A Neighbourhood Development Order (NDO) grants planning permission for specific development in a particular area. This could include things like specified changes of use, certain kinds of alteration or the reinstatement of historical features. Biddulph Town Council is developing an NDO for the Town Centre, driven by the community and stakeholder engagement.

Why are we doing this?

We consulted with people in the town as part of the development of the Neighbourhood Plan. They overwhelmingly said that the town centre needed re-thinking! Developing an NDO will help us to be clear about the priorities and access funding that could help to make changes.

What will it do?

Biddulph Town Council has delivered a number of community events to explore what people would like to support and see in our Town Centre. These events have been used to identify the draft area that we are now consulting on and the proposed themes it will cover.

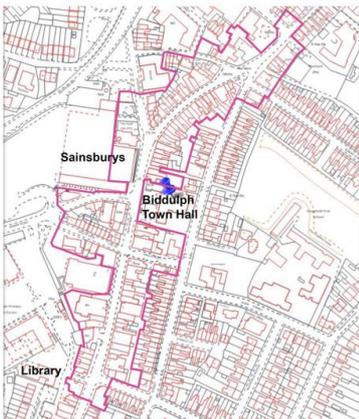
Applicable to the entire area shown on the draft plan there are two parts to the emerging NDO. These are:

- **Part 1 Supporting Mixed use of B1 (Business) of upper floors:** In addition to permitted development rights enabling conversion of many upper floors to 2 residential flats, to encourage more people into the town centre and make better use of existing buildings, upper floors of existing buildings could also be used for B1 (Business).
- **Part 2 Reinstatement of Historic Shopfronts:** Building upon the SMDC shopfronts design guide and community engagement this will enable incremental change of the external shopfronts and signage to encourage a range of better designs, improving the overall appearance of the town centre. This may include, signage, shopfront and entrance design, type of materials, erection of canopies and shutters.

Your thoughts and comments on these are welcomed!

Where will it cover?

The following map is the draft Neighbourhood Development Order Area, which has been drawn following consultation in late 2018 and early 2019. The area has been drawn based on comments and suggestions to mark the area of concentrated local businesses that could benefit in the Town Centre.



(Source: Base map taken from SMDC interactive planning map 2019. Once a formal area has been decided Biddulph Town Council will work with SMDC to draw a detailed final version that will be taken to formal consultation later this year)

Following these events, below is a letter that was sent to all town centre traders, inviting them to a session where they could discuss their aspirations with regard to the development of the town centre. This was hand-delivered by volunteers to each premises, allowing the opportunity to discuss the content of the session in advance.



Stage 3 – Six Weeks Formal Statutory Pre-Submission Consultation (Regulation 14)

A press release setting out the Regulation 14 consultation arrangements was circulated locally to online, printed and radio news outlets. It contained the following information:

Biddulph residents, supported by Biddulph Town Council, are undertaking the formal presubmission consultation of the draft Neighbourhood Development Order for Biddulph.

Consultation will run from Monday 23 September, midday to Monday 4 November, midday.

This is a six-week statutory consultation period and we welcome comments on the draft documents.

To view the documents, hard copies together with consultation forms can be found at the following locations:

- *Biddulph Moor Post Office*
- *Biddulph Town Hall*
- *Biddulph Valley Leisure Centre*
- *Biddulph Doctors*
- *Biddulph Valley Doctors*
- *Brown Lees Post Office*
- *Flavours, Smithy Lane*
- *Biddulph Library*

An electronic copy is also available to view online or download at <http://biddulph.co.uk/neighbourhood-development-order/> together with a downloadable consultation form.

Biddulph residents, supported by Biddulph Town Council, will also be at the following community events and markets where the plan can also be viewed:

- *Saturday 28 September, 10-2pm Biddulph Town Hall*
- *Friday 4 October, 11-2pm and Friday 1 November, 11-2pm Biddulph Artisan Market (town centre)*
- *Saturday 5 October, 10-2pm Biddulph Town Hall (part of the 'Ethical Fair')*
- *Sunday 6 October, 11-2pm Biddulph Youth and Community Zone (part of 'Staged: Theatre for the Ages' event)*

We want to hear from you, please give your views on any of the policies in the draft Plan and any other comments you would like to make.

Posters and flyers were also produced for display and circulation around the town.

A list of statutory consultees was requested from, and supplied by, Staffordshire Moorlands District Council. Each of these was individually approached either by letter or email according to the preference expressed in the list supplied by the District Council. A full list of these statutory consultees is included at Appendix 2.

Responses to the consultation were logged by Biddulph Town Council and analysed by Urban Vision. The Neighbourhood Plan Working Group considered the responses and determined the changes required to the Order.

A summary of responses from statutory consultees have been included in Appendix 3, together with the comments of the Working Group and the agreed modifications to the plan.



Conclusions

The Town Council and the Neighbourhood Plan Working Group have been pleased with both the support received from residents for production of the Neighbourhood Development Order, and the overwhelming number of positive comments received during consultations. Comments have been constructive and have enabled the Order to be refined to a point where the Working Group believe that it will meet the needs of the area and its residents for years to come.

The production of a Neighbourhood Development Order alongside a Neighbourhood Plan has been well supported by Locality, and has received praise nationally as being 'pioneering'. The Working Group remain dedicated to ensuring that the needs of the community are represented within this document and its implementation, and are hopeful that there will be a positive outcome in terms of sustainability of the town centre going forward.

Appendix 1 - Regulation 14 Public Consultation

Publicity/ Press Releases:

- Biddulph Chronicle
- Biddulph Times
- Radio Stations: Signal 1; BBC Radio Stoke; Moorlands Radio
- Sentinel

Publicity/ Posters:

- All Biddulph Town notice boards and those in the villages
- All Schools
- All venues where a hard copy is available to view/comment on
- Biddulph Bowling Club
- Biddulph Grange Country Park
- Biddulph Moor Post Office
- Biddulph Moor Village Hall
- Biddulph Valley Leisure Centre
- Biddulph Valley Surgery
- Chemists
- Churches
- Dentists
- Fire Station
- Gillow Heath Recreation Ground
- Greenway Bank Country Park
- Home Bargains
- Knypersley Sports Club
- Library
- Mailing list to Groups and Organisations (WI, U3A, Youth Centre)
- Nursery
- Petrol Stations
- Pubs
- Sainsburys
- Vets

Publicity/ Website:

- Biddulph Town Council
- Social Media
- Staffordshire Moorlands District Council

Publicity/ Direct Engagement:

- Saturday 28 September, 10-2pm Biddulph Town Hall
- Friday 4 October, 11-2pm and Friday 1 November, 11-2pm Biddulph Artisan Market (town centre)
- Saturday 5 October, 10-2pm Biddulph Town Hall (part of the 'Ethical Fair')
- Sunday 6 October, 11-2pm Biddulph Youth and Community Zone (part of 'Staged: Theatre for the Ages' event)

Publicity/ Hard Copy Plan Locations:

- Biddulph Moor Post Office
- Biddulph Town Hall
- Biddulph Valley Leisure Centre
- Biddulph Doctors
- Biddulph Valley Doctors
- Brown Lees Post Office
- Flavours, Smithy Lane
- Biddulph Library

Appendix 2 Statutory and Other Consultees

As part of the pre-submission (Regulation 14) consultation, the following bodies were individually contacted and asked for their comments:

The Coal Authority
Sport England
Natural England
Highways England
Network Rail
Historic England
National Grid
Seven Trent
United Utilities
Environment Agency
Homes England
Marine Management
Canal and River Trust
Western Power
Office of Rail and Road
Amec FW
Staffordshire County Council
Staffordshire Moorlands District Council
Town and Parish Councils
East Staffs Borough Council
Peak District
Stoke-on-Trent City Council
Newcastle Borough Council
Stafford Borough Council
Cheshire East Council
Derbyshire Dales

Stoke on Trent and Staffordshire LEP
Local Nature Partnership
North Staffs CCG
Healthwatch
Support Staffordshire

Residents/ Community Associations and local voluntary sector organisations.

Appendix 3 Comments from Statutory Consultees and Modifications Made

National and Statutory Bodies

Natural England Letter 14th October 2019

Comments and Suggested Amendments	Comments	Suggested Modification for the NDO
<p>Natural England does not have any specific comments on the draft Biddulph Neighbourhood Plan, or the draft Biddulph Neighbourhood Development Order. However, we refer you to the attached annex which covers the issues and opportunities that should be considered when preparing a Neighbourhood Plan.</p>	<p>General comments noted.</p>	<p>No action required.</p>

Historic England Letter 31st October 2019

Comments and Suggested Amendments	Comments	Suggested Modification for the NDO
<p>Historic England has no adverse comments to make upon the draft plan which we feel takes a suitably proportionate approach to the main historic environment issues pertaining to Biddulph. We commend the commitment in the Plans Vision, objectives and policies to support well designed locally distinctive development that is sympathetic to the character of the area including its rural landscape character, views and green spaces. The Neighbourhood Development Order also promises to make a positive contribution to the future viability and vibrancy of the High Street. Beyond those observations we have no further substantive comments to make. I hope you find this advice helpful.</p>	<p>General comments noted.</p>	<p>No action required.</p>

Local Authorities and Parish Councils

Staffordshire County Council Letter 25th October 2019

Representations and Suggested Amendments	Comments	Suggested Modification for the NDO
<i>NB: This was an extensive representation which included general commentary and more detailed comments on the NDP policies. Please refer to the consultation response for details.</i>	There were no specific comments related to the NDO.	No action required.

Staffordshire Moorlands District Council Letter 4th November 2019

Representations and Suggested Amendments	Comments	Suggested Modification for the NDP
<p><u>Part 1 – Use of Upper Floors for Business Purposes</u></p> <p>Condition II – ‘<u>significant</u> nuisance’ phrases like this need to be interpreted by the public and planning professionals . More clarity is required to ensure that details are not misinterpreted. There is less scope for subjectivity in permitted development than in the application of policy.</p> <p>Condition III – This does not read as a conventional planning condition (e.g. setting out details such as materials to be used, working hours on site etc.). The wording is difficult to understand. In this instance, the condition reads more like a statement of fact in respect of A2 use (i.e. A2 is not B1). In relation to light industry, this could end up immediately adjacent to residential on an upper floor along a terraced row. Does condition II adequately cover this scenario? What about deliveries? Notwithstanding the fact that B1c uses should not cause detriment to residential amenity, is there an increased risk of such issues arising by including B1c in the NDO?</p>	<p>Condition II - The need for there to be no significant nuisance could only be judged after the change of use had occurred, and would need a judgment to be made. In the interests of clarity, delete condition.</p> <p>Condition III – this is included as explanation only, so is not required.</p> <p>B1 refers to uses that can take place in a residential area. The area is commercial in nature.</p>	<p>Conditions II and III have been deleted.</p>
<p><u>Part 2: Replacement of Shop Fronts</u></p> <p>Understanding of the issue the Neighbourhood Development Order (NDO) is seeking to address is key. Having reviewed the Design Codes Report undertaken for the Town Council by AECOM, it covers shopfronts and a number of other public realm type issues. Is there a particular reason why shopfronts are being addressed through the NDO? Is this an issue which is not satisfactorily being addressed through the current planning applications process? It is suggested that some explanatory text is included in the introduction to the NDO to give an indication of the problem / issue the NDO will address.</p>	<p>These comments appear to misunderstand the situation. The NDO is simplifying the process by removing the need for a planning application.</p> <p>There are few surviving historic shopfronts, and most shopfronts</p>	<p>No action</p>

Representations and Suggested Amendments	Comments	Suggested Modification for the NDP
<p>It is agreed that the Askey & Sutcliffe shopfront used in the AECOM work (p.52) is an example of a good period shop front. However, a review of all existing shopfronts within the NDO application boundary is needed to assess which are good examples that should be retained and why (both historic and modern) and which would benefit from improvements. Does the NDO as drafted increase the risk that existing high quality shop fronts could be lost?</p>	<p>date from the later 20th century. So low risk of loss. The area is not a conservation area, though designation should be considered.</p>	
<p>The wording contained within the NDO is vague and open to interpretation and this will create problems when it is being used e.g.</p> <ul style="list-style-type: none"> • Permitted development needs to be written in a way that the public and case officers can understand without the need for interpretation, for example: “new shop fronts will be permitted unless: (insert criteria)”. • The enforcement of unauthorised shopfronts also requires consideration when writing the NDO as this cannot successfully be undertaken without precise wording. • Without clarity, unintended consequences could occur by leading to the replacement of good quality shopfronts with worse ones as occupiers change. <p>Examples of unclear wording are:</p> <ul style="list-style-type: none"> • Definition of lighting – it needs to be more precise as to the type of external lighting – for example a rash of swan neck lights may not be desirable. 	<p>The structure and terminology are influenced by The Town and Country Planning (General Permitted Development) (England) Order 2015.</p> <p>Minor changes can be made to the wording for clarity.</p> <p>The definitions can be updated for clarity.</p> <p>There is no need to include colours – shopfronts can be painted without consent.</p>	<p>The definitions have been updated, for clarity.</p> <p>The requirements for shutters, canopies, pilasters and cornice have been clarified.</p> <p>Metal has been removed as a stallriser material.</p>

Representations and Suggested Amendments	Comments	Suggested Modification for the NDP
<ul style="list-style-type: none"> • Definition of shutters – precise wording is required to avoid the risk of external shutters being used. “They must be placed internally behind the shop front” – inside of the glass? Recessed? What level of perforation? All of these details make a difference to the appearance of the shop front. • Definition of canopies – need to be more precise or this could result in bolt-on awning boxes. • Shopfront colours do not appear to be covered. • Definition of fascia – It is recommended that the Fascia board should be within the shopfront not above it and contained by the pilasters. A 550mm fascia is very deep and could be disproportionately deep on a small shopfront. It states that the fascia board should be timber but what about the signage to be placed on it? • Stallrisers could also be of self-coloured render. Query whether metal stallrisers exist? It is advised that the stallriser should be contained within the pilasters and the height of the plinth should line up with the stallriser. • It is advised that the pilasters should project slightly and have a plinth, upper section lining up with the fascia and cornice above. • It is advised that the shopfront should have a defined upper edge marked by a projecting, moulded cornice. 	<p>Metal is used for some historic stallrisers, but can be removed from the NDO for clarity.</p>	

Representations and Suggested Amendments	Comments	Suggested Modification for the NDP
<p>The diagrams included in the document are more detailed than the wording and the user would be unsure as to which apply. This needs to be made clear. Council officers could discuss technical details if required.</p> <p>An alternative way to cover shop front design would be to include a policy in the Neighbourhood Plan. This would enable the Town Council and others to still have the opportunity to comment on a proposal whereas including it as permitted development would not.</p>	<p>The wording grants planning permission. The diagrams are compatible with the diagrams.</p> <p>The purpose is to remove the requirement for a planning application for those wishing to reinstate more appropriate shop fronts.</p>	<p>Some updates to wording for clarity, as described previously.</p>

Appendix 4 Residents and Consultants Correspondence

Representations and Suggested Amendments	Comments	Suggested Modification for the NDO
<p>10 Survey Monkey responses were received. Comments were positive:</p> <p><i>'By creating more use of the buildings you could create a more vibrant atmosphere'.</i></p> <p><i>'We have some very interesting shop front designs when you actually look up.'</i></p> <p><i>'This is a reasonable length of time as it gives a chance to see which parts work and which parts don't and then it can be reviewed'.</i></p> <p><i>'Empty floors in buildings do not look good'.</i></p> <p>People took the opportunity to raise other issues as part of this consultation:</p> <p><i>'Sainsbury's has current vacant premises with high rents, which is a problem. Biddulph High Street ought to keep its specialist businesses for many years to come.'</i></p> <p>And,</p> <p><i>'The town centre is uninviting, uninspiring and difficult to get into if you are new to the area'.</i></p>		<p>No action required.</p>